

MAUREEN MCOWEN
JONATHAN REISCHL
TRACY L. HILMER
ALICIA FERRARA
(202) 435-9202
maureen.mcowen@cfpb.gov
jonathan.reischl@cfpb.gov
tracy.hilmer@cfpb.gov
alicia.ferrara@cfpb.gov
1700 G Street, NW
Washington, DC 20552

*Attorneys for Plaintiff Bureau of
Consumer Financial Protection*

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF UTAH

BUREAU OF CONSUMER FINANCIAL
PROTECTION,

Plaintiff,

v.

PROGREXION MARKETING, INC., *et al*,

Defendants.

Case No. 2:19-cv-00298-BSJ

**PLAINTIFF'S MOTION FOR LEAVE TO FILE AN OVERLENGTH
MOTION FOR AWARD OF RELIEF AND ENTRY OF FINAL
JUDGMENT**

Plaintiff, the Bureau of Consumer Financial Protection (Bureau), respectfully moves for leave to file a 6,200-word motion requesting award of monetary and injunctive relief, assessment of civil money penalties, and entry of final judgment on Count I of the Amended Complaint.¹

Under DUCivR 7-1(a)(4)(D)(i), the Bureau's motion is limited to 3,100 words or 10 pages, but the Court may grant leave for a motion exceeding that limit upon a showing of good cause why additional words or pages are needed. DUCivR 7-1(a)(6)(A).

The Bureau respectfully requests leave to include 3,100 extra words, for a total of 6,200 words, in its motion. The extra 3,100 words are needed for the Bureau to present its requests for consumer redress, injunctive relief to prevent Defendants from further violating 16 C.F.R. § 310.4(a)(2), and civil money penalties, as well as the legal and factual bases for these remedies. These matters warrant fulsome briefing so that the Court will have the benefit of all of the relevant authority and record citations. Accordingly, good cause exists that justifies the need for an extension of the word count limitations specified in DUCivR 7-1(a)(4)(D)(i).

A proposed order extending the word-count limit is attached hereto.

¹ The Bureau conferred with Defendants regarding this request for a word-count extension, but the parties were unable to reach an agreement.

Dated: April 4, 2023

Respectfully submitted,

/s/ Jonathan Reischl

MAUREEN MCOWEN

JONATHAN REISCHL

TRACY L. HILMER

ALICIA FERRARA

Enforcement Attorneys

Bureau of Consumer Financial Protection

1700 G Street, NW

Washington, DC 20552

Telephone: (202) 435-9202

maureen.mcowen@cfpb.gov

jonathan.reischl@cfpb.gov

tracy.hilmer@cfpb.gov

alicia.ferrara@cfpb.gov

*Attorneys for Plaintiff Bureau of
Consumer Financial Protection*